

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE UBIQUITI NETWORKS, INC. SECURITIES LITIGATION
THIS DOCUMENT RELATES TO: ALL CASES

No. 1:18-cv-01620 (VM)

Class Action

**LEAD PLAINTIFF'S MOTION  
TO DISTRIBUTE THE SETTLEMENT FUND**

Pursuant to the Final Judgment Approving Class Action Settlement and Order of Dismissal With Prejudice dated March 27, 2020 (Dkt. No. 49, the “Final Order”) and the Stipulation of Settlement dated December 3, 2019 (Dkt. No. 39-1, the “Stipulation”),<sup>1</sup> Lead Plaintiff hereby moves for an order:

- (i) approving the administrative determinations of the claims administrator, JND Legal Administration (“JND” or “Claims Administrator”), accepting and rejecting claims submitted herein;
- (ii) barring claims filed after and barring documentation for deficient claims filed after July 15, 2020 on lack of timeliness grounds;
- (iii) authorizing Proofs of Claim and administration and distribution of the Settlement Fund;
- (iv) authorizing distribution of the Net Settlement Fund, \$9,153,612.32, to Settlement Class Members whose Proofs of Claim have been accepted;
- (v) authorizing the distribution, no earlier than six (6) months from the date of the Initial Distribution (as that term is defined in the Segura Declaration), any unclaimed, residual balance in the Net Settlement Fund after the Initial Distribution, after paying any amounts mistakenly omitted from the initial disbursement, and after deducting the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, if any, to all Claimants who have cashed their checks from the Initial Distribution and whose proportionate share of the remaining Net Settlement Fund is \$10.00 or

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<sup>1</sup> Unless otherwise indicated, all capitalized terms herein have the same meanings as set forth in the Stipulation.

more. Additional distributions, after deduction of costs and expenses as described in this paragraph, and subject to the same conditions, may occur thereafter in 6-month intervals until Lead Counsel, in consultation with JND, determines that further distribution is not cost-effective;

- (vi) authorizing that thereafter, if any sums remain unclaimed and are not sufficiently large enough to warrant further distribution, the balance be paid to the Institute for Law and Economic Policy;
- (vii) authorizing payment of outstanding fees and expenses totaling \$524,683.04 to JND;
- (viii) ordering that all persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the claims submitted herein or otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund are released and discharged from any and all claims arising out of such involvement, and all Settlement Class Members, whether or not they are to receive payment from the Net Settlement Fund, are barred from making any further claim against the Net Settlement Fund or the released persons beyond the amount allocated to them pursuant to this Court's order; and
- (ix) granting such other and further relief as this Court deems appropriate.

In support of this motion, Plaintiffs submit herewith an accompanying Memorandum of Law and the Declaration of Luiggy Segura in Support of Lead Plaintiff's Motion for Approval of Distribution Plan.

Dated: November 24, 2020

**POMERANTZ LLP**

/s/ Michael Grunfeld

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the Settlement Class*

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*Additional Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2020, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system.

/s/ Michael Grunfeld  
Michael Grunfeld